

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

THE LOCAL SPOT, INC., <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:20-cv-00421
)	Judge Richardson
FREDDIE O'CONNELL, <i>et al.</i>,)	Magistrate Judge Newbern
)	
Defendants.)	

TOOTSIE'S ENTERTAINMENT, LLC d/b/a TOOTSIE'S ORCHID LOUNGE, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:21-cv-00501
)	Judge Richardson
FREDDIE O'CONNELL, in his official capacity as Mayor of Metropolitan Nashville-Davidson County, <i>et al.</i>,)	Magistrate Judge Newbern
)	
Defendants.)	

ELEVENTH JOINT STATUS REPORT ON STATE COURT PROCEEDINGS

In accordance with the Court's Order (Doc. No. 212), the Parties submit this status report of the state court proceedings. Since the Parties filed their Tenth Joint Status Report (Doc. No. 228), the Tenn. R. Civ. P. 30.02(6) depositions of Jackson's Old Hickory Country Club and Rippy's Smoking Bar & Grill were taken by Metro Nashville. The parties participated in a case management conference and filed a proposed case management and scheduling order. Metro Nashville is to file a motion to quash certain discovery requests, which will be heard on November 15, 2024, and trial is set for February 2025. A subsequent case management conference has also been set for November 15, 2024.

The Parties' next status report will be filed within sixty (60) days.

Respectfully submitted,

DEPARTMENT OF LAW OF THE
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
WALLACE W. DIETZ (BPR No. 9949)
DIRECTOR OF LAW

/s/ Michael R. Dohn

ALLISON L. BUSSELL (BPR No. 23538)

ASSOCIATE DIRECTOR OF LAW

MELISSA ROBERGE (BPR No. 26230)

SENIOR COUNSEL

MICHAEL R. DOHN (BPR No. 37535)

ASSISTANT METROPOLITAN ATTORNEY

Metropolitan Courthouse, Suite 108

P.O. Box 196300

Nashville, Tennessee 37219

(615) 862-6341

allison.bussell@nashville.gov

melissa.roberge@nashville.gov

michael.dohn@nashville.gov

*Counsel for the Metropolitan Government
Defendants*

/s/ Kirk L. Clements (w/ permission MRD)

KIRK L. CLEMENTS (BPR No. 20672)

105 Broadway, Ste. 2

Nashville, Tennessee 37201

(615) 964-8000

(615) 953-1902

kirk@kirkclementslaw.com

/s/ James Bryan Lewis (w/ permission MRD)

JAMES BRYAN LEWIS (BPR No. 15116)

1300 Division St., Suite 307

Nashville, Tennessee 37203

(615) 256-2602

(615) 242-5967 (fax)

bryan@bryanlewislaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served via the CM/ECF electronic filing system to:

Kirk L. Clements
105 Broadway, Ste. 2
Nashville, TN 37201

James Bryan Lewis
1300 Division St., Suite 307
Nashville, TN 37203

William L. Harbison
Lisa K. Helton
Christopher C. Sabis
Hunter C. Branstetter
Sherrard Roe Voigt & Harbison, PLC
150 3rd Avenue South, Suite 1100
Nashville, TN 37201

on October 7, 2024.

/s/ Michael R. Dohn
Michael R. Dohn